

COHEN & GRESSER LLP

800 Third Avenue New York, NY 10022 +1 212 957 7600 phone www.cohengresser.com

Mark S. Cohen 212 957 7601 mcohen@cohengresser.com

MEMO ENDORSED

December 29, 2020

BY ECF

Hon. Edgardo Ramos Thurgood Marshall United States Courthouse 40 Foley Square, Room 619 New York, NY 10007

Re: T.S., et al v. The Rockefeller University, No. 20-cv-08724 (S.D.N.Y.)

Dear Judge Ramos:

We represent The Rockefeller University (formerly known as The Rockefeller Institute and The Rockefeller Institute for Medical Research), of which The Rockefeller University Hospital is a center (together, the "University") in the above-referenced action. We write to respectfully request that the Court adjourn (i) the pre-motion conference and pretrial discovery conference currently scheduled in this action for January 5, 2021, to a day and time convenient to the Court during the week of January 18, 2021 and (ii) the deadline for the parties to submit a proposed discovery plan from January 4, 2021 to Monday, January 18, 2020. (See Dkt. No. 20 (order setting pre-motion and discovery conference).) The University respectfully requests this adjournment because the University's offices are closed during the holidays, making it more difficult for defense counsel to confer with its client during this period and to ensure that it can meaningfully engage with Plaintiffs concerning a proposed discovery schedule and minimize potential disputes for the Court to resolve in this regard.

No prior request to adjourn these deadlines has been made. Plaintiffs consent to the requested adjournment.

Respectfully submitted,

/s/ Mark S. Cohen

Mark S. Cohen

CC: All counsel (by ECF)

The conference scheduled for January 5, 2021 is hereby adjourned to January 22, 2021 at 11:30am. The call in information will remain the same: The parties are instructed to dial (877) 411-9748 and enter access code 3029857# when prompted. SO ORDERED.

The application is \underline{X} granted

__ denied

Edgardo Ramos, U.S.D.J Dated: 12/29/2020 New York, New York